

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

LAW OFFICES OF LEE M. PERLMAN  
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In Re:  
Grace Massella

Case No.: 19-33514 ABA  
Chapter: 13  
Hearing Date: 04/02/2024  
Judge: ABA

### CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor(s) in this case opposes the following (choose one):

1. ☒ Motion for Relief from the Automatic Stay filed by PHH Mortgage Corporation,  
creditor,  
A hearing has been scheduled for April 2, 2024, at 10:00 am.

☐ Motion to Dismiss filed by the Chapter 13 Trustee.  
A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

☐ Certification of Default filed by \_\_\_\_\_.  
I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (choose one):

☐ Payments have been made in the amount of \$\_\_\_\_\_, but have not been  
accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes  
repayment as follows (explain your answer):

☒ Other (explain your answer):

I have always maintained flood insurance on my property, and a copy of said policy has  
been sent to PHH. I should not be responsible for their advances when insurance was  
already in place.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 03/26/2024

/s/ Grace Massella  
Debtor's Signature